

EXHIBIT B

Patricia Cuniff

From: Rune Kraft <rk@kraft.legal>
Sent: Tuesday, August 31, 2021 12:49 PM
To: 'Roger Higgins'
Cc: James O'Neill
Subject: RE: Notification of Imminent Filing of Motion for Civil Contempt

Mr. Higgins,

Received.

The Article I court in Delaware lacks jurisdiction and thus the power to do anything, including compelling me to respond to motions, attend hearings and/or follow the orders it has and/or may issue. Jurisdiction is power to declare the law, and without jurisdiction the judges cannot proceed at all in any cause. *Ruhrgas AG v. Marathon Oil Co. et al.*, 526 U.S. 574 (1999).

As the Article I court has been informed – “I do not consent to the jurisdiction of this court”.

Thanks,

Rune

From: Roger Higgins <rhiggins@rogerhigginslaw.com>
Sent: Tuesday, August 31, 2021 12:20 PM
To: Rune Kraft <rk@kraft.legal>
Cc: 'James O'Neill (jo'neill@pszjlaw.com)' <jo'neill@pszjlaw.com>
Subject: Notification of Imminent Filing of Motion for Civil Contempt

Mr. Kraft,

On August 27, 2021, you violated the August 26, 2021 order of the United States Bankruptcy Court by filing your motion in the Arizona District Court for review of the Bankruptcy Court’s August 26 Order.

As I warned you in my e-mail correspondence to you of August 27, 2021, W. R. Grace & Co. reserved the right to file a motion for a finding of civil contempt in the Bankruptcy Court if you filed such a motion.

Please be advised that Grace will be filing such a civil contempt motion in the Bankruptcy Court today on shortened notice. Grace has requested a hearing date of September 8, 2021, or otherwise as soon as is practicable for the Court to have this hearing.

Please be further advised that, should you fail to file your pleading in the Arizona Court on September 2, 2021, seeking dismissal of Grace with prejudice from the Arizona litigation, which is required by the Bankruptcy Court’s August 26 Order, Grace will bring this further violation of that order to the Bankruptcy Court’s attention prior to the hearing through a supplemental pleading.

Moreover, if you file any other pleadings in any other court prior to the hearing on Grace’s civil contempt motion, including in the Arizona District Court, any such violation of the Confirmation Order and the August 26 Order will also be brought to the attention of the Bankruptcy Court.

Each of your violations of the Bankruptcy Court’s orders will likely cumulatively weigh against you, which will likely be directly relevant to the remedy that the Bankruptcy Court will likely impose upon you.

Finally, please be further advised that you will be served by e-mail correspondence and next-day mail of each of Grace’s filings and the hearing notice and agenda.

Please confirm to me that you received this e-mail correspondence. Also, please confirm that the proposed hearing date does not pose an irreconcilable conflict for you.

Warmest Regards. R

Roger J. Higgins
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